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February 25, 2009

Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

Re: **EB Docket No. 06-36**
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2008

Cellular South, Inc.
Cellular South Licenses, Inc.

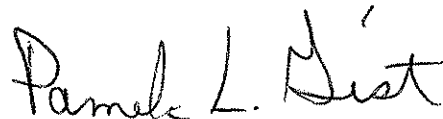
Form 499 Filer ID 808884
Form 499 Filer ID 822022

Dear Ms. Dortch:

On behalf of Cellular South, Inc. and its subsidiary, Cellular South Licenses, Inc., and pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith the carriers' CPNI certification for 2008 with accompanying statement.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Pamela L. Gist

Enclosures

cc: Enforcement Bureau, FCC (2)
Best Copy and Printing, Inc. (1)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: 2/25/2009

Name of companies covered by this certification:

Cellular South, Inc.
Form 499 Filer ID 808884

Cellular South Licenses, Inc.
Form 499 Filer ID 822022

Address: 1018 Highland Colony Parkway, Suite 300
Ridgeland, Mississippi 39157

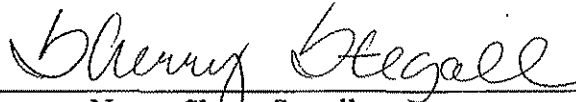
Name of signing officer: Sherry Stegall

Title of signatory: Senior Vice President

CERTIFICATION

I, Sherry Stegall, hereby certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement which (i) explains how the companies' procedures ensure that the companies are in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the Commission's rules, (ii) explains any action taken against data brokers during the past year, (iii) reports information known to the companies regarding tactics pretexters may be using to attempt access to CPNI, and (iv) summarizes any customer complaints received in the past year concerning the unauthorized release of CPNI.



Name: Sherry Stegall
Title: Senior Vice President
Date: 2.23.2009

Company Names (Collectively referred to as "Carrier"):

Cellular South, Inc.
Cellular South Licenses, Inc.

STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has adopted a manual and keeps it updated with FCC CPNI rule revisions, and has designated a CPNI compliance officer to oversee CPNI training and implementation.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations or otherwise and in connection with these procedures, Carrier has established a system of passwords and back-up authentication methods which complies with the requirements of applicable Commission rules.
- Carrier has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.

- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- Carrier took the following actions against data brokers in 2008, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: No actions taken
- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: No information received
- The following is a summary of all customer complaints received in 2008 regarding the unauthorized release of CPNI:
 - Number of customer complaints Carrier received in 2008 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI:
 4
 - Category of complaint:
 - 4 Number of instances of improper access by employees
 - Number of instances of improper disclosure to individuals not authorized to receive the information
 - Number of instances of improper access to online information by individuals not authorized to view the information
 - Number of other instances of improper access or disclosure
 - Summary of customer complaints received in 2008 concerning the unauthorized release of CPNI:
 - 3/14/2008: Account holder alleged that a Cellular South representative was divulging information regarding her account to unauthorized people. The representative named was found to have not accessed the account.
 - 4/4/2008: Account holder alleged that SMS (text messages) to and from information as well as SMS content were being released to unauthorized persons. SMS content was found to have not been released as content information is not archived on Cellular South servers.
 - 8/18/2008: Account holder believes that an employee is releasing account activity. Investigation determined the claim was unsubstantiated.

- 9/3/2008: Account holder believes that information is being released by an employee. Investigation determined the claim was unsubstantiated.

Cellular South, Inc.

STATEMENT OF COMPANY POLICY

When referred to in the guidelines set forth below, "Company," "we," or "us" refers to and includes all employees, associates, and agents of Cellular South, Inc.

Cellular South, Inc. (the "Company") has a duty to protect the confidential, Customer Proprietary Network Information ("CPNI") of our customers, other telecommunications carriers, and equipment manufacturers. Therefore, the following guidelines shall be followed by all employees and agents of the Company:

CPNI is any information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship. CPNI also includes information contained in the bills pertaining to the telephone exchange service or telephone toll service received by a customer of a carrier.

- Proprietary information of our customers, other telecommunications carriers, and equipment manufacturers is protected by Federal law.
- CPNI which the Company obtains from another carrier for the purpose of providing a particular telecommunications service may be used only for the provision of that service, and may not be used for any otherwise unrelated marketing efforts.
- Individually identifiable CPNI that we obtain by providing a telecommunications service may be used, disclosed, or released *only* in the circumstances as set forth in the Company's CPNI Operating Guidelines.

The release of any CPNI by sales personnel must be authorized by a supervisor.

The Company takes seriously the protection of our customers' CPNI, and in accordance with 47 C.F.R. § 64.2009 will be subject to disciplinary review for violation of the policies set forth above. Please contact your supervisor if you have any questions or require additional information.